

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No. 9:23-cv-81373- MIDDLEBROOKS/Matthewman

CONSUMER FINANCIAL PROTECTION BUREAU
Plaintiff,

vs.

FREEDOM MORTGAGE CORPORATION,
Defendant.

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JOINT MOTION TO MODIFY SCHEDULING ORDER AND TRIAL DATE

Plaintiff Consumer Financial Protection Bureau (Bureau) and Defendant Freedom Mortgage Corporation (Freedom) submit this Joint Motion under Local Rule 7.1(a)(1)(J) to modify the scheduling order as follows:

Current	Proposed	Event
May 2	May 16	All pretrial motions, including summary judgment motions, <i>Daubert</i> motions, and motions <i>in limine</i>
May 16	May 31	Oppositions to all pretrial motions, including summary judgment motions, <i>Daubert</i> motions, and motions <i>in limine</i>
May 23	June 7	Replies to oppositions to all pretrial motions, including summary judgment motions, <i>Daubert</i> motions and motions <i>in limine</i>
June 3	June 13	Joint pretrial Stipulation and designations of deposition testimony
June 17	June 20	Objections to designations of deposition testimony
June 24	June 28	Jury instructions or proposed findings of fact and conclusions of law

The parties jointly move this Court for a modest extension of existing dispositive motion and pretrial deadlines for good cause shown. The parties concluded an accelerated fact discovery period on Thursday, April 18, 2024, in accordance with the Court-ordered scheduling order. The parties served multiple sets of document requests, interrogatories, and requests for admission during that period, and productions continued through the final day of discovery. The parties also conducted six depositions in

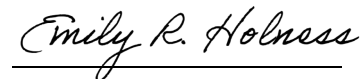
the final weeks of discovery (including two 30(b)(6) examinations on April 16 and one on April 17). In addition, the Bureau's rebuttal expert report is due on April 25, and the parties are scheduled to conduct expert depositions on May 1 and May 2. In light of the recently concluded fact discovery period and the ongoing expert work, the parties seek a short extension to allow for prompt review of the record before filing dispositive and other pretrial motions. The proposed extension would not prejudice either party, and would not materially delay resolution of the action.

The parties also jointly move this court for a change to the trial date. The case is currently set to occur during the two-week trial period commencing July 1, 2024. Due to a family wedding on July 12, defense counsel is not available for trial during that period, nor for the rest of the month due to pre-planned attorney time off. Plaintiff's counsel is not available during the month of August due to pre-planned attorney time off.

To account for these scheduling conflicts, the parties respectfully request that the trial date be scheduled to occur during the two-week trial period commencing Monday, September 9, 2024. A proposed order is attached to this motion.

Dated: April 25, 2024

Respectfully submitted,



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